Janis C. Puracal, OSB #132288 E-mail: jcp@mlrlegalteam.com

Andrew C. Lauersdorf, OSB #980739

E-mail: acl@mlrlegalteam.com

MALONEY LAUERSDORF REINER, PC

1111 E. Burnside Street, Ste. 300

Portland, OR 97214

Telephone: (503) 245-1518 Facsimile: (503) 245-1417

David B. Owens, WSBA #53856, pro hac vice

E-mail: david@loevy.com
LOEVY & LOEVY c/o
Civil Rights and Justice Clinic
University of Washington Law School
William H. Gates Hall, Suite 265
PO Box 85110
Seattle, WA 98145-1110

Telephone: (312) 590-5449

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of S.M., a minor,

Plaintiffs,

Civil No. 6:20-cv-01163-MK (Lead Case)

v.

MARK DANNELS, PAT DOWNING, SUSAN HORMANN, MARY KRINGS, KRIS KARCHER, SHELLY MCINNES, RAYMOND MCNEELY, KIP OSWALD, MICHAEL REAVES, JOHN RIDDLE, SEAN SANBORN, ERIC SCHWENNINGER, RICHARD WALTER, CHRIS WEBLEY, ANTHONY WETMORE, KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, JOEL D. SHAPIRO AS ADMINISTRATOR OF THE ESTATE OF DAVID E. HALL, VIDOCQ SOCIETY, CITY OF COQUILLE, CITY OF COOS BAY, and COOS COUNTY,

Defendants.

Page 1– PLAINTIFFS' NOTICE OF DEPOSITIONS

PLAINTIFFS' NOTICE OF DEPOSITIONS



VIDOCQ SOCIETY,

Cross-Claimant,

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE, SEAN
SANBORN, ERIC SCHWENNINGER,
RICHARD WALTER, CHRIS WEBLEY,
ANTHONY WETMORE, KATHY WILCOX,
CRAIG ZANNI, DAVID ZAVALA, JOEL D.
SHAPIRO AS ADMINISTRATOR OF THE
ESTATE OF DAVID E. HALL, VIDOCQ
SOCIETY, CITY OF COQUILLE, CITY OF
COOS BAY, and COOS COUNTY
Cross-Defendants.

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of S.M., a minor,

Civil Case No. 3:21-cv-01719-MK (Trailing Case)

Plaintiffs,

v.

OREGON STATE POLICE,

Defendant.

PLEASE TAKE NOTICE THAT plaintiffs will take the depositions upon oral examination of the below defendant and non-party witness, pursuant to Rule 30 of the Federal Rules of Civil Procedure, before a notary public or some other officer authorized to administer oaths under law as follows:

Deposition Date and Time	Witness	Location
December 11, 2023 at 3:00 p.m.	Kimberly H. Holderfield	Via Video Conferencing (Zoom) Court Reporter – US Legal Support No videographer
December 12, 2023 at 9:00 a.m.	Rule 30(b)(6) - Oregon State Police (continuation)	Via Video Conferencing (Zoom) Court Reporter – US Legal Support No videographer

Page 2-PLAINTIFFS' NOTICE OF DEPOSITIONS

MALONEY | LAUERSDORF | REINER REAL STREET | 1111 E. Burnside Street, Ste. 300 |
Portland, Oregon 97214 |
Telephone: 503.245.1518 |
Facsimile: 503.245.1417

Exhibit 1, Page 2 of 4

Declaration of Janis C. Puracal

Deposition Date and Time	Witness	Location
December 20, 2023 at 9:00 a.m.	Rule 30(b)(6) City of Coos Bay	TBD No videographer
December 20, 2023 at 1:00 p.m.	Rule 30(b)(6) Coos County	TBD No videographer
December 21, 2023 at 10:00 a.m.	Rule 30(b)(6) City of Coquille	TBD No videographer

The depositions will continue from day to day thereafter until completed. You are invited to attend and participate in the examination if you so desire.

DATED: December 4, 2023

MALONEY LAUERSDORF REINER PC	LOEVY & LOEVY
By /s/ Janis C. Puracal Janis C. Puracal, OSB #132288 E-Mail: jcp@mlrlegalteam.com Andrew C. Lauersdorf, OSB #980739 E-Mail: acl@mlrlegalteam.com	By /s/ David B. Owens David B. Owens, WSBA #53856 E-Mail: david@loevy.com Pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2023, the foregoing PLAINTIFFS' NOTICE OF DEPOSITIONS was served on the following parties at the following address by sending to them a true copy thereof via the method indicated below:

Robert E. Franz, Jr.	Jesse B. Davis
Sarah R. Henderson	Todd Marshall
Law Office of Robert E. Franz, Jr.	Oregon Department of Justice
PO Box 62	100 SW Market Street
Springfield, OR 97477	Portland, OR 97201
rfranz@franzlaw.comcastbiz.net	todd.marshall@doj.state.or.us
shenderson@franzlaw.comcastbiz.net	jesse.b.davis@doj.state.or.us
Attorneys for Defendants	Attorneys for Defendants Oregon State
City of Coquille, City of Coos Bay, Coos	Police, John Riddle, Susan Hormann,
County, Craig Zanni, Chris Webley, Eric	Mary Krings, Kathy Wilcox
Schwenninger, Sean Sanborn, Ray McNeely,	
Kris Karcher, Pat Downing, Mark Dannels,	
Kip Oswald, Michael Reaves, David Zavala,	
Anthony Wetmore, Shelly McInnes	
Anthony R. Scisciani III	Eric S. DeFreest
Kelsey L. Shewbert	Luvaas Cobb
Meredith A. Sawyer	777 High Street, Ste. 300
Rachel Jones	Eugene, OR 97401
HWS Law Group	edefreest@luvaascobb.com
101 SW Main Street, Suite 1605	
Portland, OR 97204	Laura E. Coffin
ascisciani@hwslawgroup.com	Coffin Law
kshewbert@hwslawgroup.com	541 Willamette Street, Ste. 211
msawyer@hwslawgroup.com	Eugene, OR 97401
rjones@hwslawgroup.com	lauracoffin@coffin.law
Attorneys for Defendant Vidocq Society	Attorneys for Defendant Richard
	Walter

by emailing to each of the foregoing a copy thereof to the email address above.

MALONEY LAUERSDORF REINER PC

By /s/ Janis C. Puracal

Janis C. Puracal, OSB #132288 E-Mail: jcp@mlrlegalteam.com

Attorneys for Plaintiffs

